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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 RAMON CERRANO,

14 Defendant.
15

CASE NO. 1:22-CR-00242-NODJ-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

16 **STIPULATION**

17 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
18 through defendant's counsel of record, hereby stipulate as follows:

- 19 1. By previous order, this matter was set for status conference on July 10, 2024.
- 20 2. By this stipulation, the parties now move to vacate the status conference date for the
above-mentioned defendant for a change of plea until November 4, 2024.
- 21 3. The parties agree and stipulate, and request that the Court find the following:
 - 22 a) The parties anticipate entering into and filing a plea agreement in this matter. For
that reason, the parties agree that a date of November 4, 2024, is warranted for a change of plea.
Prior to filing this stipulation, the parties conferred with the courtroom deputy for the assigned
district court judge, who indicated this date is available for a change of plea.
 - 23 b) The parties stipulate that the period of time until November 4, 2024, is deemed
excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it

1 results from a continuance granted by the Court at defendants' request on the basis of the Court's
2 finding that the ends of justice served by taking such action outweigh the best interest of the
3 public and the defendant in a speedy trial.

4 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
5 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
6 must commence.

7 IT IS SO STIPULATED.

8 Dated: July 3, 2024

9 PHILLIP A. TALBERT
United States Attorney

10 /s/ STEPHANIE M. STOKMAN
11 STEPHANIE M. STOKMAN
12 Assistant United States Attorney

13 Dated: July 3, 2024

14 /s/ CHRISTINA CORCORAN
15 CHRISTINA CORCORAN
16 Counsel for Defendant
RAMON CERRANO

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18 **ORDER**

19 IT IS SO ORDERED that the status conference set for July 10, 2024, is vacated. A change of plea
20 hearing is set for **November 4, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.**
21 Time is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

22 IT IS SO ORDERED.

23 Dated: July 8, 2024

24 /s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE